

LEE M. PERLMAN
ATTORNEY AT LAW
1926 GREENTREE ROAD, SUITE 100
CHERRY HILL, NEW JERSEY 08003
(856) 751-4224
ATTORNEY FOR DEBTOR(S), ANTOINETTE ANTONUCCI

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

RE:	:	CHAPTER 13
ANTOINETTE ANTONUCCI	:	CASE NO.: 18-10788-RG
Debtor(s)	:	MOTION TO APPROVE
	:	MORTGAGE MODIFICATION
	:	AGREEMENT

PLEASE TAKE NOTICE that Antoinette Antonucci, the Debtor, seek an Order pursuant to 11 U.S.C. § 364 and F. R.Bankr.P. 4001(c)(1), approving a loan modification agreement, between the Debtor and Selene Finance LP, which agreement modified and extended the terms of the note and mortgage beyond that of the original maturity date.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file responding papers stating, with particularity, the basis of your opposition with the Office of the Clerk of the Bankruptcy Court and serve the undersigned no later than August 14th, 2018.

In the event an objection is timely filed a hearing thereon will be heard on September 5th, 2018, at 10:30 a.m. before the Honorable Rosemary Gambardella, United States Bankruptcy Court at 50 Walnut Street, 3rd Floor, Newark, NJ, Courtroom 3E.

PLEASE TAKE FURTHER NOTICE that if written opposition is not timely filed and served, this Motion will be deemed uncontested and the relief requested may be granted without the need for a hearing.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, movant shall rely upon the annexed certification(s) of Antoinette Antonucci.

A proposed form of Order is filed and served herewith.

Movant requests oral argument only if written opposition is timely filed and served.

July 31, 2018
DATE

/s/ Lee M. Perlman
LEE M. PERLMAN, ESQUIRE

STATEMENT THAT NO BRIEF IS NECESSARY

No brief is necessary in support of the foregoing motion as it presents no novel or complex issues of law or fact and the facts and law necessary to its resolution are within the sound discretion of the court.

July 31, 2018
DATE

/s/ Lee M. Perlman
LEE M. PERLMAN, ESQUIRE